## UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI

REBECCA BLOUNT AND CHERYL MCCULLEY, on behalf of themselves and all others similarly situated,

Plaintiffs,

Case No. 4:25-cv-00259-BP

v.

CERNER CORPORATION D/B/A ORACLE HEALTH,

Defendant.

## **JOINT STIPULATION FOR STAY OF PROCEEDINGS**

Plaintiffs Rebecca Blount and Cheryl McCulley and Defendant Cerner Corporation (together with Plaintiffs, the "Parties"), by and through their respective attorneys and without waiving any rights, claims, or defenses they have in this action, enter into this Stipulation and seek an Order, with reference to the following circumstances:

WHEREAS, on April 11, 2025, Plaintiffs filed a Class Action Complaint against Defendant bringing claims arising from an alleged cybersecurity incident involving patient records maintained by Defendant (the "Incident");

WHEREAS, on April 28, 2025, Plaintiffs filed their First Amended Class Action Complaint;

WHEREAS, to date, twelve other complaints bringing similar claims arising from the Incident have been filed across the country (the "Actions");

WHEREAS, Defendant is preparing to move the Judicial Panel on Multidistrict Litigation ("JPML") to transfer the Actions for consolidated proceedings in the Western District of Missouri, and will include this case in its forthcoming motion for transfer and consolidation;

WHEREAS, the JPML's decision on Defendant's forthcoming motion for transfer and consolidation may result in the transfer of this action to another federal district or the transfer of multiple actions to this Court;

WHEREAS, Defendant was served with the First Amended Class Action Complaint on April 30, 2025;

WHEREAS, Defendant's deadline to answer or otherwise respond to the First Amended Class Action Complaint is May 21, 2025;

WHEREAS, the Court has not entered any case deadlines in this action;

WHEREAS, the Parties have conferred, and in light of Defendant's forthcoming motion for transfer and consolidation, the current uncertainty as to where the Actions will proceed, and in the interest of judicial economy and avoiding unnecessary costs, hereby STIPULATE AND AGREE to the following:

- 1. All case deadlines, including Defendant's deadline to answer or otherwise respond to the First Amended Class Action Complaint, are extended by 45 days.
- Defendant's deadline to answer or otherwise respond to the First Amended Class
  Action Complaint is July 7, 2025.

IT IS SO STIPULATED.

DATED: May 21, 2025

/s/ Brandon M. Wise Brandon M. Wise MO Bar # 67242 Peiffer Wolf Carr Kane Conway & Wise, LLP One US Bank Plaza, Suite 1950 St. Louis, MO 63101 T: (314) 833-4825 bwise@peifferwolf.com

ALMEIDA LAW GROUP LLC David S. Almeida\* 849 W. Webster Avenue Chicago, Illinois 60614 Tel: (708) 437-6476 david@almeidalawgroup.com

\*Admitted Pro Hac Vice

Counsel for Plaintiffs

DATED: May 21, 2025

/s/ Patrick Fanning

Patrick Fanning – MO Bar # 47615 LATHROP GPM LLP 2345 Grand Blvd., Suite 2200 Kansas City, MO 64108-2618 Tel: (816) 460-5416 patrick.fanning@lathropgpm.com

Counsel for Defendant